

## EX PARTE OR LATE FILED

September 17, 2014

**Ex Parte** 

ACCEPTED/FILED

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SEP 1 7 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12<sup>th</sup> Street, SW
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

Re: Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the NAPM LLC's Interim Role in Number Portability Administration Contract Management, WC Dockets No. 07-149 & 09-109; Telephone Number

Portability, CC Docket No. 95-116

Dear Ms. Dortch:

By this letter, Telcordia Technologies, Inc., d/b/a iconectiv ("Telcordia"), replies to the letter from Julie Veach, Chief, Wireline Competition Bureau, to Joel Zamlong, dated September 10, 2014 ("letter"). Please note that attachments are numbered to correspond to the question number below, rather than sequentially.

 Provide a list of all TSPs or TSP affiliates to which Ericsson Holding II, Inc., Ericsson, Inc., Telefonaktiebolaget LM Ericsson (individually and collectively, Ericsson) or Telcordia provides managed services and identify the portion of the relevant company's revenues that it receives from each TSP or TSP affiliate?

The requested information is provided in Attachment 1 for U.S. TSPs and their U.S. affiliates. As permitted by the letter, TSPs are identified by anonymous letter designations (e.g., Provider A, Provider B, etc.) to protect confidentiality, in addition to being filed pursuant to the Revised Protective Order. The response aggregates managed services for U.S. TSPs and their U.S. affiliates to the best of Telcordia's ability to do so. The response is based on calendar year 2013 revenues, and utilizes a de minimis threshold of 0.02% of Ericsson's 2013 revenues (which is approximately \$7 million). Anonymous letter designations are not cross-correlated with responses to questions 2 and 4 to safeguard against "reverse-engineering" of provider identities (however, Provider A, Provider A' and Provider A" are all different entities).

Telcordia does not provide managed services to U.S. TSPs or their affiliates. \*\*BEGIN HIGHLY CONFIDENTIAL\*\*

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2. Provide the following information with respect to all TSP or TSP affiliate vendor financing (including guarantees) for the period 2010-2013 offered by Ericsson: (a) the name of the borrower, (b) the term of the financing, (c) the amount of the financing, (d) whether the loan is current, and, if not, what steps Ericsson is taking to deal with default.

The requested information is provided in Attachment 2 for U.S. TSPs and their U.S. affiliates for each of Calendar Years 2010-2013. As permitted by the letter, TSPs are identified by anonymous letter designations (e.g., Provider A', Provider B' etc.) to protect confidentiality, in addition to being filed pursuant to the Revised Protective Order. Anonymous letter designations are not cross-correlated with responses to questions 1 and 4 to safeguard against "reverse-engineering" of provider identities (however, Provider A, Provider A' and Provider A" are all different entities).

 Identify how much business SunGard Availability Services LP (SunGard) receives from Avaya, Inc. (provide the dollar amount and the percentage of SunGard's revenues represented by Avaya.

As explained in Telcordia's Reply Comments (at 37), as a result of its spinoff from SunGard Data Systems, Inc., SunGard Availability Services LP changed its name to Sungard Availability Systems, LP ("Sungard AS"). Sungard AS is an indirect wholly owned subsidiary of Sungard Availability Services Capital, Inc., a newly formed Delaware holding company. Sungard AS provided \*\*BEGIN HIGHLY CONFIDENTIAL\*\*

### \*\*END HIGHLY CONFIDENTIAL\*\*

4. State the amount in both dollar and percentage terms of Ericsson's total gross revenue that is accounted for by sales to TSPs. Please provide a breakdown of the aforesaid amounts, stating the amounts, in percentage terms, attributable to each TSP.

The amount of Ericsson hardware and software sales to U.S. TSPs and their U.S. affiliates is provided in Attachment 4. As permitted by the letter, TSPs are identified by anonymous letter designations (e.g. Provider or Group A", Provider or Group B", etc.) to protect confidentiality, in addition to being filed pursuant to the Revised Protective Order. The response

Although "managed services" is not defined, and Telcordia does not consider this to be within the scope of "managed services," out of an abundance of caution, Telcordia is providing this information here.

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aggregates hardware and software sales for U.S. TSPs and their U.S. affiliates to the best of Telcordia's ability to do so. The response is based on 2013 revenues, and utilizes a de minimis threshold of 0.02% of Ericsson's 2013 revenues (which is approximately \$7 million). As in the response to questions 1 and 2, anonymous letter designations are not cross-correlated among responses to questions 1 and 2 to safeguard against "reverse-engineering" of provider identities (however, Provider A, Provider A' and Provider A" are all different entities).

Ericsson tracks sales by sales groups. Some sale groups are dedicated to a single provider. Others are groups of multiple providers. When sales groups are dedicated to a single provider, Attachment 4 lists the sales to that entity as "Provider." When the sales are tracked to a group of providers, Attachment 4 designates the entry as "Group." In some cases, a sales group can overlap to a limited extent or include some sales to a separately designated provider.

# 5. Provide the names of any board members or officers of any of SunGard's owners who also sit on the boards of either Ericsson or Telcordia

Neither the Ericsson nor Telcordia boards contain any board members or officers of any of Sungard AS's indirect owners with a greater than ten percent interest in SunGard AS. Interests of Sungard AS's owners with ownership interests of less than ten percent were not analyzed.

Please contact me if you have any questions regarding this response.

Sincerely,

John T. Nakahata

Counsel to Telcordia Technologies, Inc.,

d/b/a iconectiv

cc: Julie Veach
Jonathan Sallet
Lisa Gelb
Michele Ellison

Neil Dellar

Sanford Williams

Attachments

## **ATTACHMENT 1**

	Net U.S. Managed Services Sales in US Dollars	Managed Services as a % of total Ericsson	
US TSP	(Millions)	Sales	

#### **ATTACHMENT 2**

			Year					
					Term of		Current /	
		1			financing	Amount of	Non	Steps Ericsson taken
Customer	2010	2011	2012	2013	in days	Financing	Current	in case of non current

#### **ATTACHMENT 4**

	Net U.S.	Net U.S. Equipment Sales as a			5	
	<b>Equipment Sales</b>	Percentage of	Group With More	At least one TSP		
	in U.S. Dollars	Ericsson 2013	than One	included within the		
S. TSP	(Millions)	Revenues	Unaffiliated Entity	Group		